

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	)	Case No. 19-24636-GLT
	)	
Jerome D. Boyd	)	Chapter 13
Debtor	)	
	)	Doc. No.:
Nationstar Mortgage LLC d/b/a Mr. Cooper	)	
Movant	)	
	)	
v.	)	
	)	
Jerome D. Boyd	)	
Respondent	)	

**DEBTOR'S STATUS REPORT**

**AND NOW** come the Debtor, by and through Attorney, Albert G. Reese, Jr., and files the following Status Report:

1. The Debtor filed an Emergency Chapter 13 Bankruptcy Case on November 29, 2019.
2. The Debtor's completed Petition, Schedules and Plan were filed December 13, 2019.
3. The Debtor's Motion Imposing the Automatic Stay was granted on December 16, 2019.
4. The Movant filed a Motion for Relief from the Automatic Stay on February 14, 2020 alleging that the Debtor's post-petition mortgage delinquency was \$3,607.32.
5. The Debtor filed a Response alleging that he paid the Movant directly instead of paying the Chapter 13 Trustee.
6. The Court continued the matter until May 20, 2020 to allow the parties' time to

address the Debtor's assertions.

7. Counsel has confirmed with Attorney James Warmbrodt that his client received a payment of \$3,607.32 on January 28, 2020. The Debtor has made two full plan payments in the amount of \$2,250.00 for March and April of 2020. Further, Attorney Warmbrodt and I agreed that the hearing should be continued for 90 days to allow the Debtor to make timely payments and the Trustee to review and provide interim confirmation of the plan. If it pleases the Court.

**WHEREFORE**, the Debtor prays that this Honorable Court continue the Motion for Relief from Automatic Stay for (90) ninety days.

Respectfully submitted by:  
/s/ Albert G. Reese, Jr., Esq.  
Albert G. Reese, Jr., Esquire  
PA ID# 93813  
Law Office of Albert G. Reese  
640 Rodi Road, 2nd Floor, Ste 2  
Pittsburgh, PA 15235  
(412) 241-1697(p)  
(412) 241-1687(f)  
areese8897@aol.com